

FirstGroup America – Freedom of Association Policy

Purpose: FirstGroup America aspires to be a preferred employer in our industry. To that end, the company supports human rights and the individual rights of its employees, including an employee's right to associate themselves with a labor union if they so choose.

Rights: Though not an exhaustive list, management at FirstGroup America supports an employee's right to:

1. Freedom of Association
2. A secret ballot election
3. An informed choice
4. A representative voter turnout

Objective: To manage our business in support of our employees and the above rights and to refrain from management conduct, whether written or verbal, which is intended to influence an employee's view or choice with regard to labor union representation. In particular, during union organizing campaigns, management shall support the employee's individual right to choose whether to vote for or against union representation without influence or interference from management.

Policy Statement: Management shall not act in any way which is or could reasonably be perceived to be anti-union. This includes refraining from making derisive comments about unions, publishing or posting pamphlets, fliers, letters, posters or any other communication which should be interpreted as criticism of the union or advises employees to vote "no" against the union. However, we believe that employees should be able to make an informed choice and therefore management may provide balanced factual information to assist its employees in making that choice. Further guidance as to what is and is not acceptable can be given by your Human Resources Department.

Intimidation or harassment of employees or any other unlawful activity is strictly prohibited. By extension of this policy, management is reminded of its obligation to honor the principles set out in the FirstGroup CSR policy, including the Code of Business Ethics.

For any employee who feels that this policy has been violated and wishes to file a complaint, please complete a Complaint Form, which can be obtained from your local management or corporate Human Resources, and send it by one of the methods noted below:

- Via US mail to FirstGroup America, attn: Patty Jackson, 600 Vine St. Suite 1400, Cincinnati, OH 45202,
- By fax to 513-672-0225
- By email to foaupdate@firstgroup.com.

For reference, submitting a Complaint form does not affect an employee's right to file a complaint with the National Labor Relations Board or any other public agency.

Management Obligations: If you are a location manager and you become aware of union organizing activity at your facility, please notify the Vice President of your region and corporate Human Resources who will support you during such activities and who will be responsible for coordinating company communications during such activity to ensure compliance with this policy.

If you already manage a union site, this does not alter your duties in collective bargaining and acting in the best interests of the company and our employees.

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